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T.R.A. DOCKET ROOM
March 25, 2004

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VIA HAND DELIVERY

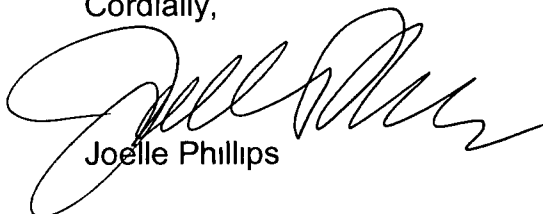
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re. *Generic Docket Addressing Rural Universal Service*
Docket No. 00-00523

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's comments regarding discovery served on it in Consolidated Docket No. 03-00585, *Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration Under the Telecommunications Act of 1996*. Although the discovery relates to the arbitration docket, the ICOs also filed the discovery in this docket. Consequently, for the convenience of the Authority and to avoid confusion, BellSouth is also providing a copy of its comments for inclusion in the record of this docket. Copies of the enclosed are being provided to counsel of record.

Cordially,



Joelle Phillips

JJP:ch

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March 25, 2004

Hon. Kim Beals, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration Under
the Telecommunications Act of 1996*
Consolidated Docket No. 03-00585

Dear Hearing Officer Beals:

BellSouth was served with Interrogatories and Requests for Production of Documents in the referenced docket on March 19, 2004. As the Hearing Officer is aware, BellSouth has not voluntarily intervened as a party and has objected to the ICO's attempt to force BellSouth to participate as a party in this docket. Both BellSouth and the CMRS carriers have briefed the issue and pointed out clear authority precedent which is squarely at odds with the ICOs' attempt to force BellSouth to be a party to an arbitration in which it is neither the requesting carrier nor the incumbent with whom the requesting carrier seeks interconnection.

Notwithstanding the objections of BellSouth and the CMRS providers, and, more importantly, notwithstanding the fact that the Hearing Officer has yet to rule on the ICOs' motion to require BellSouth's forced joinder, the ICOs have served BellSouth with discovery as if BellSouth had already been made a party. BellSouth writes to simply acknowledge receipt of these discovery requests and to inform the parties that BellSouth will not respond unless and until it is required to become a party.

The ICOs have continued with this filing their practice of filing all pleadings in both this docket and the Rural USF Docket. BellSouth respectfully submits that this practice is merely an intentional ongoing effort to blur the distinction between these dockets in an attempt to force BellSouth's participation in the arbitration docket. There has been no schedule established for discovery in the Rural USF docket. When

Hon. Kim Beals, Hearing Officer
March 25, 2004
Page 2

discovery is scheduled in that docket, BellSouth will respond to any request that is properly made and relevant to the issues in that docket.

Cordially,

A handwritten signature in black ink, appearing to read "Joelle Phillips", with a large, stylized initial "J" and a long, sweeping horizontal stroke at the end.

Joelle Phillips

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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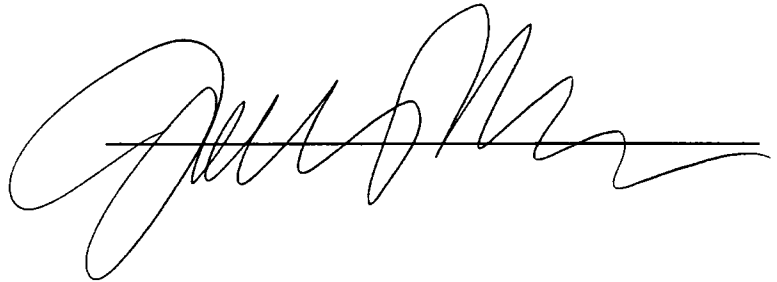
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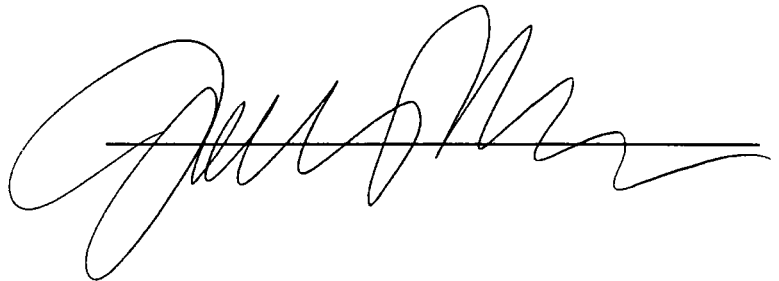
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